

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE STATE OF NEW YORK, by LETITIA
JAMES, Attorney General of the State of New
York, and

Case No. 19-cv-4024 (JMF)

THE STATE OF NEW JERSEY, by GURBIR S.
GREWAL, Attorney General of the State of New
Jersey,

MOTION FOR SUMMARY JUDGMENT

Plaintiffs,

-against-

THE UNITED STATES DEPARTMENT
OF THE TREASURY and THE INTERNAL
REVENUE SERVICE,

Defendants.
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Plaintiffs the States of New York and New Jersey hereby move for summary judgment on Counts I and II of their Complaint. This motion is supported by the arguments in the Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment, as well as the Declaration of Catherine Suvari filed with that brief, both of which will be filed concurrently with this motion. Plaintiffs have notified Defendants of this motion and Defendants intend to oppose the motion.

For the reasons stated in Plaintiffs' brief, Plaintiffs ask this Court to issue an order and judgment, pursuant to 28 U.S.C. § 2201 *et seq.*, finding that Defendants unlawfully failed to timely respond and disclose records in response to Plaintiffs' requests under 5 U.S.C. § 552(a), ordering Defendants to search for and promptly disclose all records responsive to Plaintiffs' requests within 90 days, awarding Plaintiffs' attorneys' fees and costs, and granting any other relief this Court deems appropriate.

Dated: July 29, 2019
New York, New York

Respectfully submitted,

LETITIA JAMES

Attorney General of the State of New York


By: /s/ Catherine Suvari

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